UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	
	=====X
LACONIA PROPERTIES LLC.,	Index No. 07 CV 6220 (LAP)
Plaintiff.	,

-against-

RULE 26 DISCLOSURE

TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA a/k/a ST PAUL TRAVELERS INSURANCE COMPANY,

Defendants.	
	K

Plaintiff, LACONIA PROPERTIES LLC., through their attorneys, *NESCI KEANE PIEKARSKI KEOGH & CORRIGAN, ESQS.*, submits as and for an initial disclosure pursuant to Fed. R. Civ. P. 26 (a)(1) as follows:

A. <u>Individuals likely to have discoverable information which Plaintiff may use to support their claims</u>:

George Kondos - part owner of Plaintiff LACONIA PROPERTIES LLC.

Michael J. Katos - part owner of Plaintiff LACONIA PROPERTIES LLC.

Warren W. Cronacher, P.E./Neil Schmelkin, P.E./(TAUSCHER CRONACHER PROFESSIONAL ENGINEERS, P.C.)

265 Sunrise Highway, Suite 33

Rockville Center, New York 11570

B. <u>Documents in Support of Plaintiff's Claims</u>

Plaintiff attaches hereto, and marks collectively as Exhibit "A", an "Engineer's Inspection Report" prepared for Plaintiff by TAUSCHER CRONACHER PROFESSIONAL ENGINEERS, P.C., aerial photographs of the *locus in quo*, a copy of a sales "flyer" containing a photograph of the *locus in quo*, and correspondence from TAUSCHER CRONACHER PROFESSIONAL ENGINEERS, P.C. to Plaintiff, dated January 8, 2007.

C. <u>Computation of Damages</u>

Plaintiff attaches hereto, and marks as Exhibit "B", a December 15, 2006 "spreadsheet" detailing \$219,081.92 in initial expenses/damages incurred by Plaintiff; an additional \$29,415.00 in payable losses/expenses, less unrelated expenses in the amount of \$20,000.00, and \$114,941.00 in rents lost by Plaintiff from July to December 2006, for a total loss of \$343,437.92, which amount Plaintiff claims as damages in the within action. Plaintiff reserves the right to supplement and or amend this response as additional expenses, either not yet known or not yet incurred, become known to Plaintiff.

D. <u>Disclosure of Insurance Information</u>

Plaintiff attaches hereto, marks as Exhibit "C", a copy of the policy of insurance issued by Defendant to Plaintiff for coverage for the *locus in quo* in this action, providing coverage on the date this cause of action arose.

Dated: White Plains, New York September 27, 2007

> NESCI KEANE PIEKARSKI KEOGH & CORRIGAN, ESQS.

by: JASON M. BERNHEIMER (JB9566) Attorneys for Plaintiff Office & P. O. Address 245 Main Street - Suite 600 White Plains, New York 10601 (914) 993-6200 File No. 06-159/216569

TO: SPEYER & PERLBERG, ESQS.
Attorneys for TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA a/k/a
ST. PAUL TRAVELERS INSURANCE
Office & P. O. Address
115 Broadhollow Road
Melville, NY 11747
(631) 673-6670

LACONIA PROPERTIES LLC.,

Index No. 07 CV 6220 (LAP)

=X

Plaintiff,

-against-

RULE 7.1 DISCLOSURE

TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA a/k/a ST PAUL TRAVELERS INSURANCE COMPANY,

Defendants.

Plaintiff, LACONIA PROPERTIES LLC., through their attorneys, *NESCI KEANE PIEKARSKI KEOGH & CORRIGAN, ESQS.*, submits as and for an initial disclosure pursuant to Fed. R. Civ. P. 7.1 as follows:

Plaintiff Laconia Properties, LLC, is owned by the following Partners:

Michael Demetriou

James Costaras

V & V Scoufaras Partners 23-32 26th Street Astoria, NY 11105

John Keriazes

George Kondos

E & A Associates 128 South Road Stanfordville, NY 12581

Katos 2000 128 South Road Stanfordville, NY 12581 Michael J. Katos

Dated: White Plains, New York September 27, 2007

> NESCI KEANE PIEKARSKI KEOGH & CORRIGAN, ESQS.

by: JASON M. BERNHEIMER (JB9566) Attorneys for Plaintiff Office & P. O. Address 245 Main Street - Suite 600 White Plains, New York 10601 (914) 993-6200 File No. 06-159/216569

TO: SPEYER & PERLBERG, ESQS.
Attorneys for TRAVELERS PROPERTY CASUALTY
COMPANY OF AMERICA a/k/a
ST. PAUL TRAVELERS INSURANCE
Office & P. O. Address
115 Broadhollow Road
Melville, NY 11747
(631) 673-6670

	AFFIDAVIT OF SERVICE
STAT	E OF NEW YORK)
COUN) ss: NTY OF WESTCHESTER)
	GEORJEAN M. SQUILLANTE, being duly sworn, says:
York.	I am not a party to the action, am over 18 years of age and reside in Westchester County, New
	On September 27, 2007 I served the within <i>Plaintiff's Rule 7.1 and Rule 26(a)(1) Disclosure</i>
	by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under clusive care and custody of the U.S. Postal Service within New York State, addressed to each of llowing persons at the last known address set forth after each name.
[] I knew	by delivering a true copy thereof personally to each person named below at the address indicated, weach person served to be the person mentioned and described in said papers as a <i>party therein</i> .
TO:	SPEYER & PERLBERG, ESQS. Attorneys for TRAVELERS PROPERTY CASUALTY COMPANY OF AMERICA a/k/a ST. PAUL TRAVELERS INSURANCE 115 Broadhollow Road Melville, NY 11747
	a to before me on this ay of September, 2007 GEORJEAN M. SQUILLANTE
	Notary Public
Notar Quali	SON M. BERNHEIMER ry Public, State of New York No. 02BE6019121 ified in Westchester County mission Expires February 1, 2011